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Remarks

Applicant carefully considered the Office Action mailed on September 7, 2005. Claims 1-101 are currently pending in the present application. Of the pending claims, the Examiner rejected claims 1-101. In view of the following remarks, Applicant requests further examination and reconsideration of the present patent application.

The Examiner rejected claims 1-101 under 35 USC §103(a) as being unpatentable over Lloyd et al. (hereinafter Lloyd), US Patent No. 6,219,790, in view of Vorobiev, US Patent No. 6,651,063. Applicant respectfully traverses the rejection of claims 1-101 under 35 USC 103(a) over Lloyd in view of Vorobiev. It is respectfully submitted that the Applicant's invention as recited in independent claims 1, 10, 19, 26, 27, 36, 45, 54, 62, 70, 76, 84, 92, 100 and 101 and claims depending therefrom, is not obvious in view of the applied references, taken individually or in combination. Applicant further submits that the applied references fail to teach or suggest a gateway device for securely managing activities between a device and a service provider, wherein the gateway device comprises an authenticator that authenticates the identity of the service provider and the device; an access authorizer that permits the service provider to interact with the device; and an activity manager, responsive to the access authorizer and the authenticator, that manages the activities occurring between the service provider and the device, wherein the activities comprise exchanging status information, diagnostic information, usage history, notifications of failure and status updates between the device and the service provider.

Lloyd discloses a centralized general-purpose authentication authorization and accounting (AAA) server for maintaining accounting information, user authentication information and authorization information for a user who is requesting access to a network. In addition, Lloyd discloses a mechanism for authenticating and authorizing user access to a computer network by determining if the login information provided by a user matches information stored in a user record.

Lloyd does not disclose a gateway device for securely managing activities between a device and a service provider in order to obtain information such as status information, diagnostic information and usage history from the device and offer information to the provider about the

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device such as notifications of failure and status updates. Applicant has carefully reviewed the material in col. 3, lines 23-30, col. 4, lines 15-21 and col. 5, lines 5-16 cited by the Examiner, and submits that these sections fail to disclose or suggest a gateway device for securely managing activities between a device and a service provider. Instead these sections disclose means for authenticating and authorizing user access to a computer network by determining if the login information provided by a user matches information stored in a user record. Further, these sections disclose the types of network elements that are attached to a network, wherein the network elements represent certain services that are available to users having access to the network. In addition, these sections disclose a technique for checking the accuracy of a user's login information using a permit, wherein a permit is required to be held by a user who is requesting access to a service, such as a news service, a WWW service and a mail service (see, for e.g., col. 5, lines 5-12 in Lloyd) provided by the network.

Further there is no motivation in Lloyd to combine it with Vorobiev. Vorobiev discloses an information organization system and method to provide means for a provider of information to have continued access to the information provided to a user so that the provider can update the information as necessary. Vorobiev does not disclose a gateway device for securely managing activities between a device and a service provider. Therefore, Vorobiev (either alone or in combination with Lloyd) does not disclose, teach or suggest or disclose a gateway device for securely managing activities between a device and a service provider.

Obviousness cannot be established absent a teaching or suggestion in the prior art to produce the claimed invention. For a *prima facie* case of obviousness, the Examiner must set forth the differences in the claim over the applied references, set forth the proposed modification of the references, which would be necessary to arrive at the claimed subject matter, and explain why the proposed modification would be obvious. It is well-established law that the mere fact that references may be combined or modified does not render the resultant modification or combination obvious unless the prior art suggests the desirability of the modification or combination. As stated above, nowhere do the applied references teach, suggest or disclose a gateway device for securely connecting arbitrary devices and service providers and managing activities between a device and a service provider.

Applicant interprets the Office Action as stating that the proposed modification is to use the gateway of Lloyd to include the features taught by Vorobiev, in order to simplify operations

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and processes and in order to allow an entire household of smart appliances to be remotely diagnosed and maintained by a vendor. However, Applicant respectfully submits that there is no suggestion in the applied references that teach the desirability of having a gateway device for securely connecting arbitrary devices and service providers to manage activities between a device and a service provider. The applied references merely disclose a centralized general-purpose authentication authorization and accounting (AAA) server for maintaining accounting information, user authentication information and authorization information for a user who is requesting access to a network and an information organization system and method to provide a means for a provider of information to have continued access to the information provided to a user so that the provider can update the information as necessary.

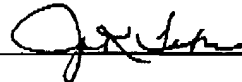
Therefore, no reasonable combination of Lloyd and Vorobiev would obtain Applicants recited invention of a gateway device for securely managing activities between a device and a service provider, wherein the gateway device comprises an authenticator that authenticates the identity of the service provider and the device; an access authorizer that permits the service provider to interact with the device; and an activity manager, responsive to the access authorizer and the authenticator, that manages the activities occurring between the service provider and the device, wherein the activities comprise exchanging status information, diagnostic information, usage history, notifications of failure and status updates between the device and the service provider. Thus, Applicant submits that the Examiner has failed to provide a basis in the art for combining the applied references that would support a *prima facie* case of obviousness. Accordingly, Applicant respectfully submits that the claimed invention, as recited in now presumably allowable independent claims 1, 10, 19, 26, 27, 36, 45, 54, 62, 70, 76, 84, 92, 100 and 101 define allowable subject matter over the applied art. Withdrawal of the rejections is respectfully requested, and allowance of claims 1, 10, 19, 26, 27, 36, 45, 54, 62, 70, 76, 84, 92, 100 and 101 is respectfully solicited. Claims 2-9, 11-18, 20-25, 28-35, 37-44, 46-53, 55-61, 63-69, 71-75, 77-83, 85-91 and 93-99 depend directly or indirectly from claims 1, 10, 19, 26, 27, 36, 45, 54, 62, 70, 76, 84, 92, 100 and 101 and are therefore similarly patentable by dependency.

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Should the Examiner believe that anything further is needed to place the application in even better condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number below.

Respectfully submitted,



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Dec. 6

,2005

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